

EXHIBIT 18

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE ALTA MESA) Case No.:
RESOURCES, INC.) 4:19-cv-00957
SECURITIES LITIGATION)

ORAL AND VIDEOTAPED DEPOSITION OF
ROBERT RASOR

November 8, 2023

ORAL AND VIDEOTAPED DEPOSITION OF ROBERT
RASOR, produced as a witness at the instance of the
Plaintiffs, and duly sworn, was taken in the
above-styled and numbered cause on the 8th day of
November, 2023, from 9:05 a.m. to 7:03 p.m., via
videoconference, before Abigail Guerra, CSR, in and for
the State of Texas, reported by machine shorthand, where
all attendees appeared via Zoom in their respective
locations, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

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1 overlapping. This is intended to be a fresh sample. I
2 believe I referred to that in the report.

3 Q. Was there something physically different about
4 the new wells as opposed to the wells that were already
5 on production?

6 A. I guess I don't understand. Exactly what
7 physical differences are you looking at?

8 Q. I mean, so -- is there anything different about
9 the new wells versus the other wells other than that the
10 old wells are drilled -- or came onto production after
11 December 1st, 2017?

12 A. Well, I mean, most likely one of the
13 differences that comes to mind are probably --
14 generation 2.5 fracture hydraulic fracture design,
15 whereas, the wells prior were -- had a few 2.5, some 2s.
16 So that would be one difference that comes to mind.

17 Q. Okay.

18 But you didn't -- but is it true that there
19 were a number of gen 2.5 completion method wells in the
20 old well set?

21 A. There were, but you would expect that these new
22 wells would most likely be predominantly generation 2.5.

23 Q. And the 125 wells that Alta Mesa included --
24 that you were looking at, those are the 125 wells that
25 Alta Mesa included in its year-end 2017 type well

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1 number -- a certain minimum number of wells involved.
2 That's sort of the overall picture that I'm trying to
3 paint.

4 Q. (BY MR. BRODEUR) Why was December 2017 time to
5 get a fresh sample?

6 A. Well, I just -- I was saying you needed a fresh
7 sample. I looked at the wells that were included in the
8 125, and it looked like most of those wells were pre- --
9 they're data was pre- -- as I mentioned like the second
10 or third week of November, I can't remember which --
11 well, now, I was saying you've got some new wells in
12 December. And you should add those to your Sample B, if
13 you will, you want to -- you know you had a Sample A.
14 Now, you're going to get a Sample B.

15 You can go ahead and apply the year-end
16 2017 as you have, but you want to start taking a new
17 sample. You couldn't have included the December wells
18 in the year-end 2018 because most of them would have
19 only been a couple weeks. You wouldn't have anywhere
20 near the time to analyze those wells.

21 Q. Is it true that the December 1st, 2017, cutoff
22 date was chosen arbitrarily?

23 A. No.

24 Q. Could you perform the same analysis using, you
25 know, May 2017 as a cutoff date?

1 A. Well, sure.

2 The analysis could have been performed, but
3 I don't feel that it would have been accurate. I mean,
4 I gave you the reasons that I chose December the 1st,
5 2017. It's because I didn't want to overlap, and it was
6 a lot of new wells coming on. I mean, it was a pretty
7 big chunk. It was, like, 26 wells in December. So it
8 wasn't arbitrary.

9 I mean, I looked at the data, and I made a
10 -- I made a choice. I wasn't -- I wasn't -- it wasn't
11 arbitrary at all.

12 Q. Other than the fact that the new wells were
13 generation 2.5 and the -- the 125 wells had a mix of
14 different generations, was there anything else that was
15 different about the new wells that made you think that
16 the data from the old wells couldn't simply serve as the
17 reliable predictor for how those wells would perform?

18 A. Well, I think that the 125 well sample was
19 perfectly applicable to year-end 2017 for the work that
20 was done.

21 But things were changing in the field.
22 Wells were being added. More wells were being added in
23 some sections. It was my opinion that it was time to
24 get that fresh sample. Sample B that included wells
25 that were -- I hate to use the word "different," but,

1 you know, they were in some -- in some regards, they
2 were different. They were 2.5. There may have been
3 more wells say per section. I think it was time to get
4 a fresh sample, and I think the fresh sample should have
5 started December 1st.

6 Q. All right.

7 And so you -- it's -- it's your opinion
8 that when there are more wells per section, there may be
9 a different production profile from those wells,
10 correct?

11 A. Well, that's why you would take the sample is
12 to determine that.

13 Q. Okay.

14 And so it's your opinion that -- strike
15 that.

16 Isn't it true that in the sample of 125
17 wells, there were a number of wells with the generation
18 2.5 completion method?

19 MR. FOERSTER: Objection to the form of the
20 question; asked and answered.

21 A. (No response.)

22 Q. (BY MR. BRODEUR) Can you answer it again for
23 me, please?

24 A. There were wells in the 125 well group that had
25 generation 2.5 fracture trees.

1 Q. Thank you.

2 And were there wells in the 125 well set
3 that had generation 2.5 completion method and were
4 drilled in patterns of multiple wells?

5 A. I didn't go back and review that.

6 I would -- I would expect that there were.
7 Because at that time, there were sections that had more
8 than one well per section. I didn't go back and review
9 the individual wells and how many were in per -- per
10 section, et cetera.

11 Q. Is there any -- is there any reason why --
12 strike that.

13 Are you familiar with the Ash-Foster
14 Pattern Development?

15 A. I know the name since Mr. Fetkovich was looking
16 at pattern development. I didn't -- I've seen the name.

17 (Simultaneous cross-talk ensues.)

18 Q. (BY MR. BRODEUR) Sorry.

19 You don't know the details of how that
20 section was spaced, landed, completed?

21 A. I couldn't tell you that today, no.

22 Q. Okay.

23 Hypothetically, if there were several
24 wells, say -- just say five wells in the set of 125
25 which were drilled in -- at spacing of, say, multiple

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1 concept was followed through by Alta Mesa when they
2 eliminated some of the extremely tight spaced wells from
3 the year-end -- year-end 2017 time frame?

4 Q. Is it also true that a type curve constructed
5 using wells spaced far apart might not accurately
6 predict the production profile of future wells that are
7 drilled close together?

8 A. That is true.

9 And that's exactly why I believe a second
10 data set should have been collected and analyzed.

11 Q. Would it be possible to -- if the question was
12 asked, when in 2017 Alta Mesa could reasonably be
13 confident that its new wells -- strike that. Let me get
14 -- let me get the language.

15 Okay. So I'm just going to change the
16 question by putting 2017 instead of 2018, and I'm
17 reading from your assignment section of your report.

18 So would it be possible to answer the
19 question, when in 2017 Alta Mesa had sufficient
20 available -- data available to estimate with reasonable
21 confidence a reasonable average ultimate oil recovery
22 attributable to its new wells if you define those wells
23 as coming online after December 1st, 2016?

24 MR. FOERSTER: Objection to the form of the
25 question.

1 A. Everything else constant, I don't know how many
2 wells -- and I didn't look at that. So I don't have any
3 well counts and the like there. But everything else
4 being constant, a mathematical calculation similar to
5 the one that I did for my initial report could obviously
6 be done.

7 Q. (BY MR. BRODEUR) And when you pick the cutoff
8 date of December 1st, 2017, you understood that certain
9 defendants in this case have advanced the argument that
10 they could not or should not have known that the new
11 drilling plan would not work out until about October of
12 2018, correct?

13 MR. FOERSTER: Objection to the form of the
14 question.

15 MR. BRODEUR: I'll ask a different
16 question.

17 Q. (BY MR. BRODEUR) You understood that the
18 defendants in this case were looking for an opinion that
19 to the effect of essentially the opinion that you give
20 in the Subsection A, correct?

21 MR. FOERSTER: Objection to the form of the
22 question.

23 A. If I didn't read it in the complaint -- and I
24 don't remember at any time that I knew, in fact, that
25 defendants had issues along those lines. And I

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1 history, I can count out to the date when the 23rd well
2 or the 37th well, depending on which one of these
3 figures you're looking at, began production. So through
4 that process, I can determine the date that the 23rd or
5 the 37th well. And the statistical analysis tells me
6 how many wells I need to look at.

7 Q. Thank you for that clarification.

8 So even if -- if all the wells
9 hypothetically came online right away, December 2nd, and
10 you had all -- or not all the wells, but sufficient
11 number of wells -- 23 or 36 wells come online
12 December 2nd -- you would still need to review that
13 data? You would still need eighth months for that data
14 to come in, correct?

15 A. That's my opinion, yes.

16 Q. Okay.

17 So there's eight months built into this
18 analysis that does not depend on the statistical
19 analysis, correct?

20 A. That eight months depends. Yes, that's true.
21 It's not related to the statistical analysis. It's
22 related to collection of well-behaved production data.

23 Q. Okay.

24 So you have the eight months, plus whatever
25 you get from the statistical analysis, and then looking

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1 answer to your question would fall on July 1st, 2018, or
2 later simply by the way you defined your methodology?

3 (Simultaneous cross-talk ensues.)

4 A. No. It can't -- it can't happen like that for
5 two reasons.

6 All of the wells do not come on on December
7 the 2nd. And secondly, you have to wait until the last
8 well of the 23 comes on. And then that well itself has
9 to have eight months of data collection regardless of
10 how many months of data collection you have for wells
11 that came on prior.

12 The 23rd well -- you have to have all 23.
13 So you have to go from the 23rd well when it came
14 online, you have to move out from there eight months.
15 Maybe I misunderstood your question?

16 Q. (BY MR. BRODEUR) Maybe.

17 I'm just saying it would be sometime after
18 July 1st because you've built in eighth months before we
19 even get to the statistics, right?

20 A. Well, they're separate. I mean, the statistics
21 tells me how man wells I can use that to determine the
22 time, and it's really based on data for the two months
23 to get to peak rate. And then it's my experience that
24 you need a minimum of six months. So that's how the
25 eight months gets built in.

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